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October 15, 2010

United States Department of Health and Human Services  
Agency for Healthcare Research and Quality  
Attention: Nancy Wilson - Room 3216  
540 Gaither Road  
Rockville, MD 20850

Dear Ms. Wilson:

Thank you for the opportunity to provide input in the development of a National Health Care Quality Strategy and Plan. Below are comments and suggestions from the Massachusetts Executive Office of Health and Human Services in response to the feedback questions in the request for input published on September 9, 2010.

*Feedback Question #1: Are the proposed Principles for the National Strategy appropriate? What is missing or how could the principles be better guides for the Framework, Priorities and Goals?*

We feel the principles are appropriate. Putting patient-centeredness first sends a very positive message about the importance of that principle. We recommend that the second principle should include geographic locations in addition to service locations and provider types in addition to sources of coverage.

*Feedback Question #2: Is the proposed Framework for the National Strategy sound and easily understood? Does the Framework set the right initial direction for the National Health Care Quality Strategy and Plan? How can it be improved?*

The overall framework for the National Quality Strategy is clear and makes sense. The focus of the initial direction on helping the patient become an engaged partner in their care is an important strategy. To improve and implement the framework, especially around the wellness goals, it will be important to come to agreement on the essential components of each concept so that measurable goals and targets may be set.

In the Affordable Care Framework, the phrases "best possible care" at all stages of health and disease and "reins in" unsustainable costs are somewhat idiomatic. These might be more easily understood if phrased, "high quality care" and "better controls or reduces" unsustainable costs.

The Healthy people/Healthy Communities framework would be more inclusive and encompassing of all levels with the word "all" before health care providers.

*Feedback Question #3: Using the legislative criteria for establishing national priorities, what national priorities do you think should be addressed in the initial National Health Care Quality Strategy and Plan in each of the following areas:*

- a. Better Care: Person-centered care that works for patients and providers. Better care should expressly address the quality, safety, access, and reliability of how care is delivered and how patients rate their experience in receiving such care;*

The national priorities we think should be addressed in this area are care transitions, discharge teaching, behavioral health, setting quality and safety goals for all health care settings, public reporting of quality data and consumer engagement in quality data.

- b. Affordable Care: Care that reins in unsustainable costs for families, government, and the private sector to make it more affordable; and*

The national priorities we think should be addressed in this area are cost containment goals including: payment reform (bundled care/payments, global payments, Accountable Care Organizations), administrative simplification, and wellness programs.

- c. Healthy People/Healthy Communities: The promotion of health and wellness at all levels.*

The national priorities we think should be addressed in this area are to adopt an industry-wide wellness definition and use it in all patient and health care communications and to have universal health care workers so that the workforce is more flexible and can address care needs across all settings.

*Feedback Question #4: What aspirational goals should be set for the next 5 years, and to what extent should achievable goals be identified for a shorter timeframe?*

We recommend the establishment of national goals for improving health care quality, containing health care costs, and reducing racial and ethnic disparities in health care for the next 5 years including higher penetration of medical home models and transitional care coaching or other programs. Furthermore, behavioral health care should be called out as a specific priority goal area. We also recommend annual objectives to demonstrate progress toward achieving those goals each year. We recommend clearly stating that such goals are aspirational, and do not establish requirements under the Affordable Care Act.

*Feedback Question #5: Are there existing, well-established, and widely used measures that can be used or adapted to assess progress towards these goals? What measures would best guide public and private sector action, as well as support assessing the nation's progress to meeting the goals in the National Quality Strategy?*

We recommend the National Quality Forum (NQF) measures for these purposes.

*Feedback #6: The success of the National Health Care Quality Strategy and Plan is, in large part, dependent on the ability of diverse stakeholders across both the public and private sectors to work together. Do you have recommendations on how key entities, sectors, or stakeholders can best be engaged to drive progress based on the National Health Care Quality Strategy and Plan?*

We recommend the use of State-specific task forces, united through CMS or AHRQ, to align goals across all states and include plans for public reporting.

*Feedback Question #7: Given the role that States can play in organizing health care delivery for vulnerable populations, do the Principles and Framework address the needs and issues of these populations?*

Yes, we believe the Principles and Framework address the needs and issues of these populations.

*Feedback Question #8: Are there priorities and goals that should be considered to specifically address State needs?*

We don't have any comments on specific priorities or goals but, as noted above, recommend that States should be engaged in this process through state State-specific task forces, united through CMS or AHRQ, to align goals across all states.

*Feedback Question #9: What measures or measure sets should be considered to reflect States' activities, priorities, and concerns?*

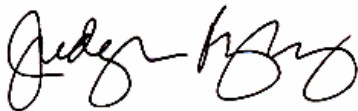
NQF measures

*Feedback Question #10: What are some key recommendations on how to engage with States and ensure continued alignment with the National Quality Strategy?*

As noted above, we recommend that States be engaged in this process through state State-specific task forces, united through CMS or AHRQ, to align goals across all states.

We appreciate the opportunity to provide input in the development of a National Health Care Quality Strategy and Plan and look forward to working in partnership with AHRQ to implement the quality related provisions of the Affordable Care Act.

Sincerely,

A handwritten signature in black ink, appearing to read 'JudyAnn Bigby'.

JudyAnn Bigby, M.D.